

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2018 MAR 29 PM 3:41

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UNITED STATES OF AMERICA

v.

JEFFREY ROBTOY, aka "Jeff,"
ANDRE HUDSON,
Defendants.

Criminal No.

5:18-cr-33-1-2

INDICTMENT

Count One

The Grand Jury charges that:

Between in or about February of 2017 and in or about November 2017, in the District of Vermont, the defendant, JEFFREY ROBTOY, aka "Jeff," unlawfully and knowingly managed and controlled 45 North Elm Street, Apartment #4, St. Albans, Vermont, as an occupant and knowingly and intentionally made available for use this apartment for the purpose of unlawfully distributing heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. § 856(a)(2))

Count Two

The Grand Jury further charges that:

On or about April 24, 2017, in the District of Vermont, the defendant, JEFFREY ROBTROY, aka “Jeff,” knowingly and intentionally distributed heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

Count Three

The Grand Jury further charges that:

Between in or about September 2017 and in or about November 2017, in the District of Vermont and elsewhere, the defendants, JEFFREY ROBTROY, aka “Jeff,” ANDRE HUDSON, and others, known and unknown to the Grand Jury, knowingly and willfully conspired to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C), 846)

Count Four

The Grand Jury further charges that:

On or about November 2, 2017, in the District of Vermont, the defendants, JEFFREY ROBTOY, aka “Jeff,” and ANDRE HUDSON, knowingly and intentionally possessed with intent to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. § 2)

Forfeiture Notice – No. 1

1. The allegations contained in Counts One and Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 846 or 841(a)(1), the defendants JEFFREY ROBTOY and ANDRE HUDSON, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following: Approximately \$7,732.00 in U.S. currency seized on or about November 2, 2017.

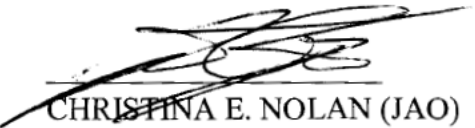
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of this court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(21 U.S.C. § 853)

A TRUE BILL

FOREPERSON



CHRISTINA E. NOLAN (JAO)

United States Attorney
Burlington, Vermont
March 29, 2018